

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JODY REILLY,
Plaintiffs

v.

1:05-cv-11806-RWZ

THOMAS ROBBINS, as Colonel
of the Massachusetts State Police,
MASSACHUSETTS STATE
POLICE,
Defendants

**ASSENTED-TO MOTION
TO EXTEND DISCOVERY
DEADLINES**

The Defendants, the Massachusetts State Police and its former Colonel, Thomas Robbins, move to extend the written discovery deadlines for ninety days from May 15, 2007 to August 15, 2007 and re-schedule the remaining deadlines accordingly. The Defendants so move and the Plaintiff Jody Reilly assent for the following reasons:

1. They are attempting in good faith to complete fact discovery, in a timely and cost-effective manner but due to schedules and Defendant counsel's medical leave for surgery, the parties have been unable to do so.
2. The Plaintiff served written requests for production of documents upon the Defendants on December 6, 2006 and interrogatories on December 29, 2007, but Defendant for the previously cited reasons has not yet been able to respond to these discovery requests.
3. Plaintiff's attorney contacted Defendant's attorney and the parties held a teleconference on April 23, 2007, while Defendant's counsel was on a protracted medical leave following knee surgery, to address the matter of the outstanding discovery responses. This motion to extend the discovery deadlines results from the April 23 teleconference.

Both parties agree that extending the fact discovery deadline from May 15, 2007 to August 15, 2007 would not harm either parties' interests and would further judicial economy.

DEFENDANTS

By their attorneys,

MARTHA COAKLEY
ATTORNEY GENERAL

/s/ Maite A. Parsi

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ASSENTED TO:

JODY REILLY

By her attorney,

/s/ Scott W. Lang

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Local Rule 7.1(A)(2) Certificate

Pursuant to Local Rule 7.1(A)(2), counsel for the Defendant Massachusetts State Police certifies that counsel for the parties successfully conferred and narrowed the pertinent issues to those addressed in this document.

/s/ Maite A. Parsi

Maite A. Parsi